AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America
v.
Meghan Rutledge, (DOB: XXXXXXXXX) (AKA: Meghan Bostic)
William Thomas Bostic Jr., (DOB: XXXXXXXX) (AKA: Tom Bostic)

Defendant(s)

Case: 1:21-mj-00625
Assigned To : Faruqui, Zia M.
Assign. Date : 10/5/2021
Description: Complaint w/ Arrest Warrant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of _____ in the _____ in the District of Columbia, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1752(a)(1)-	Entering and Remaining in a Restricted Building or Grounds
18 U.S.C. § 1752(a)(2)-	Disorderly and Disruptive Conduct in a Restricted Building or Grounds
40 U.S.C. § 5104(e)(2)(D)-	Disorderly Conduct in a Capitol Building
40 U.S.C. § 5104(e)(2)(G)-	Parading, Demonstrating, or Picketing in a Capitol Building

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

[redacted]
Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 10/05/2021

Zia M. Faruqui
2021.10.05 16:49:53 -04'00'

Judge's signature

City and state: Washington, D.C. Zia M. Faruqui, U.S. Magistrate Judge
Printed name and title

Case: 1:21−mj−00625
Assigned To : Faruqui, Zia M.
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STATEMENT OF FACTS

1. Your affiant, [redacted], is a SPECIAL AGENT assigned to the FEDERAL BUREAU OF INVESTIGATION (FBI). In my duties as a special agent, I have been assigned to a squad that investigates matters of national security, and I have received training in the collection and evaluation of physical and digital evidence. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a SPECIAL AGENT, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

2. The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

3. On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

4. As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

5. At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

6. Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice

President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

7. During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

8. On and around January 8, 2021, FBI Norfolk Division received multiple tips that an individual by the name of **MEGHAN RUTLEDGE**, also known as **Meghan Bostic (RUTLEDGE)**, was captured in images of the unlawful activity that occurred on January 6, 2021, in and around the Capitol building. Further investigation, detailed below, determined that **RUTLEDGE** is the daughter of **WILLARD THOMAS BOSTIC, JR.** aka **Tom Bostic (BOSTIC)**.

9. As a result of these tips, FBI interviewed two individuals who identified **RUTLEDGE** as an individual inside the Capitol building. Person-1 has known **RUTLEDGE** for a significant period of time. On January 8, 2021, Person-1 took screen shots of Facebook posts made by **RUTLEDGE**, during which **RUTLEDGE** appeared to be taking photos from inside the Capitol building with a device reasonably believed to be her cell phone. On January 8, 2021, Person-1 provided a screenshot of a Facebook post made by **RUTLEDGE** stating "After miles and miles of walking and climbing and climbing some more we made it inside the capitol building. What an experience for the books". The screenshot from Facebook included a small profile photo and several photos from outside the Capitol with a "+19" indicator that represented an additional 19 photos that were posted to her page (Picture One).

Picture One:

Meghan Rutledge
19m ·
After miles and miles of walking and climbing and climbing some more we made it inside the capitol building . What an experience for the books
TRUMP
+19
1

10. United States Capitol Police (USCP) provided the affiant with specific closed-circuit television (CCTV) footage that captured distinct individuals **RUTLEDGE** had posted photos of, further described below. Upon reviewing the footage, an individual matching the description of **RUTLEDGE** was identified as entering through the doorway (Picture Two) next to a broken window where she watched other individuals climb through and enter the U.S. Capitol (Picture Three).

Picture Two:

Picture 3:

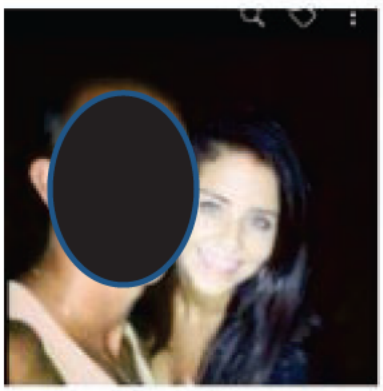
11. Using the information available, your affiant queried a Commonwealth of Virginia law enforcement database. The results of the query verified that the individual pictured in the Facebook account and in the CCTV footage appears to be **RUTLEDGE** based upon government records. The query identified the subject as **Megan Elizabeth Bostic**, which is believed to be **RUTLEDGE**'s maiden name.

12. A comparison of the Facebook photos and CCTV footage was made and the affiant corroborated **RUTLEDGE**'s presence inside the Capitol. Photographs depicting **RUTLEDGE**, a Caucasian female who resides in Virginia Beach, Virginia is shown below.

Source: Capitol Police

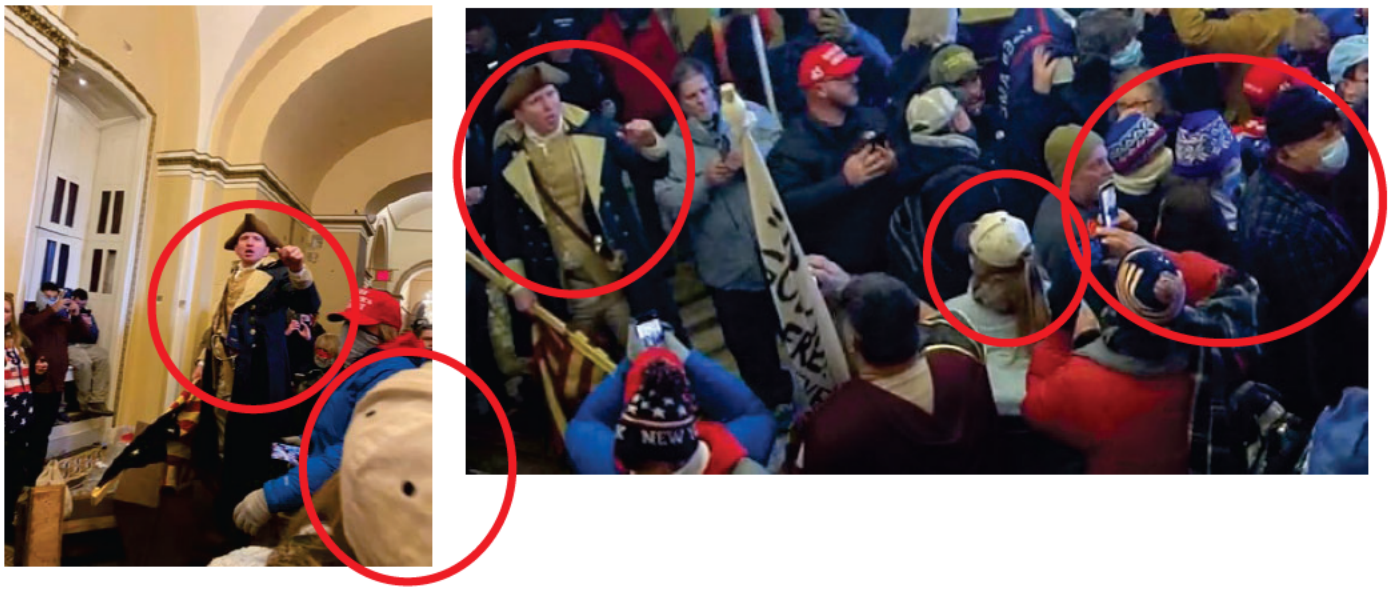
Source: Facebook

Source: Facebook

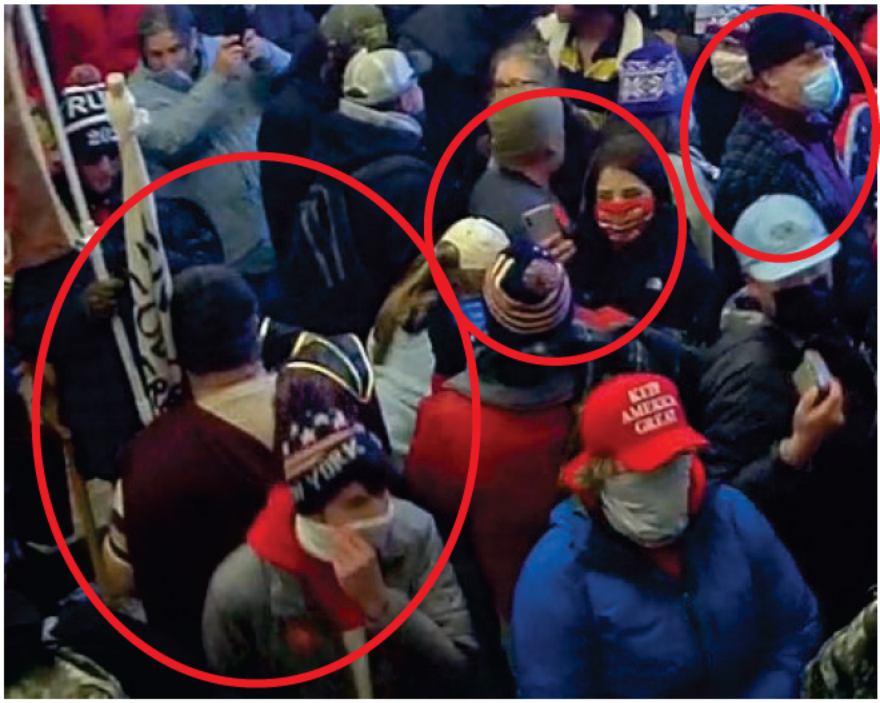


13. On February 11, 2021, Person-2 provided additional screenshots from **RUTLEDGE**'s Facebook page of images posted from inside the Capitol which are shown below. Person-2 has known **RUTLEDGE** for a significant period of time and saw that the images posted by **RUTLEDGE** were from outside and inside the Capitol building. Person-2 provided several screenshots of photos posted by **RUTLEDGE** on her Facebook page, which can be seen below. Upon receiving these photos, the affiant reviewed CCTV security footage. The affiant found CCTV footage that captured **RUTLEDGE** taking photos and videos on her cell phone that were cross referenced with the images provided by Person-2. The images from **RUTLEDGE**'s Facebook, provided by Person-2, included photos of individuals dressed in distinctive Colonial-style (Picture Four) and Spartan-inspired (Picture Five) costumes who were also captured on CCTV. Upon review of CCTV footage, the affiant discovered **RUTLEDGE** using her cell phone to capture the photos of the individuals in Picture Four and Picture Five. Picture Six is a screenshot of CCTV footage which shows **RUTLEDGE**, with individuals investigators believe to be **BOSTIC** and Female-1, a woman with blond hair, a tan baseball cap and a light blue face mask, and who is believed to be a member of **RUTLEDGE'S** family, together in the same area of the Capitol while **RUTLEDGE** appears to use her cellphone.

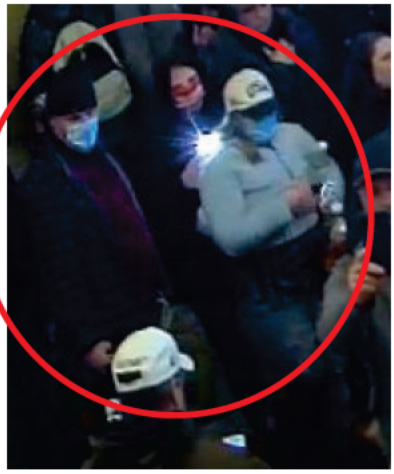
Picture Four: CCTV footage (right) of RUTLEDGE at a slightly different moment, taking Picture Four (left) on her cell phone. Individuals believed to be BOSTIC (black knit cap, dark flannel shirt, and white face mask) and Female-1 (tan baseball cap) are seen in the CCTV footage next to RUTLEDGE.



Picture Five: CCTV footage (right) of RUTLEDGE around the time Picture Five (left) was taken. BOSTIC (black knit cap, dark flannel shirt, and white face mask) is standing behind RUTLEDGE, and Female-1 (tan baseball cap with ponytail) is in front of her.

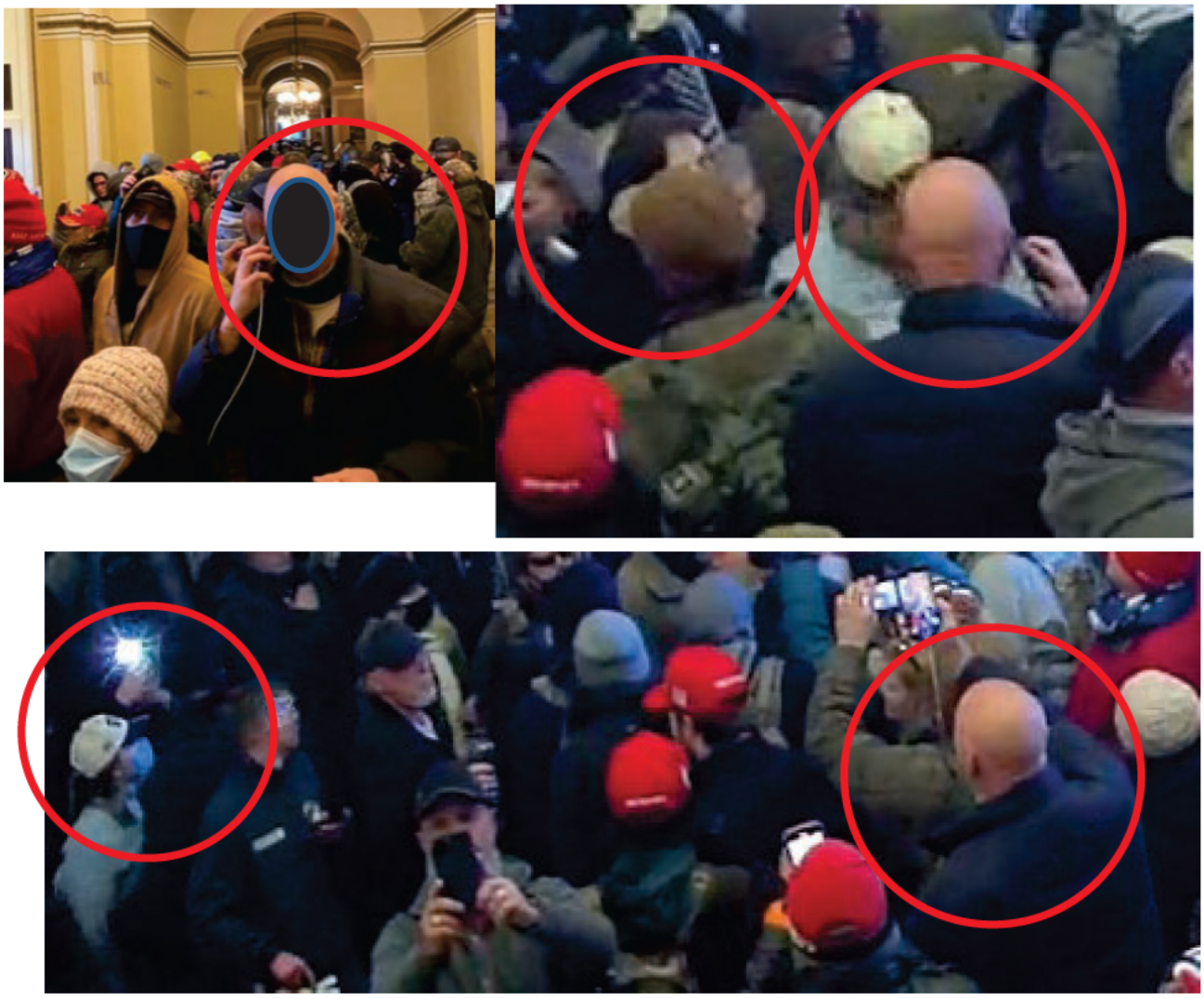


Picture Six: CCTV footage of BOSTIC, RUTLEDGE, and Female-1.



14. Another distinctive individual seen in the photos posted by **RUTLEDGE** included a bald man on a cellphone (Picture Seven). CCTV footage showed **RUTLEDGE** moving through the interior of the Capitol near this individual whom she took pictures of.

Picture Seven: CCTV footage (right) of RUTLEDGE taking the picture (left) of the bald man at slightly different times than that of the photo she posted on Facebook. CCTV footage (bottom) depicts RUTLEDGE and another individual together in the proximity of the bald man pictured in RUTLEDGE's photos posted on Facebook.



15. A tall man wearing a dark blue flannel shirt, black knit cap, and a light blue face mask and Female-1were seen with **RUTLEDGE** in her Facebook photos (Picture Eight) and on USCP security cameras (Picture Nine and Picture Ten). The three individuals were seen entering the Capitol together. They stayed together the entire time, took several photos and videos together and departed together. The affiant and a Task Force Officer assigned to interview **RUTLEDGE** attempted to make contact at a residence associated with her and her parents on February 10, 2021. A man answered the door and identified himself as **BOSTIC**, **RUTLEDGE's** father, but would not provide additional information. Additionally, during that

interaction, **BOSTIC** appeared to wear the same blue flannel shirt at his residence as seen in the CCTV and Facebook photos which lead the affiant to investigate **BOSTIC.**

16. According to records obtained through a Search Warrant served on T-Mobile, on January 6, 2021, at or about the time of the incident described above, that is, at approximately between 3:15 p.m. EST and 3:37 p.m. EST, the cellphone associated with a phone number ending in 6514, registered to **BOSTIC**, was identified as having utilized a cell site consistent with providing service to a geographic area that includes the interior and exterior area surrounding the United States Capitol building.

17. Based upon CCTV footage, photos provided by government databases and social media, the interaction at **BOSTIC's** residence, and cellular phone location data provided by T-Mobile for the cellular phone registered to **BOSTIC**, the affiant has probable cause to believe that the man seen entering the Capitol with **RUTLEDGE** is her father, **BOSTIC**.

Picture Eight: Photograph obtained from RUTLEDGE's Facebook account

Picture Nine from CCTV:

Picture Ten from CCTV

18. During the course of the investigation, Navy Federal Credit Union provided information that **BOSTIC** was a customer involved in an incident documented by the credit union's security division. Investigators showed employees Picture 9, a still photo of **BOSTIC** from U.S. Capitol CCTV footage while he wore a mask. None of the employees could make an identification of

BOSTIC based upon the photo.

19. Person-2 positively identified **RUTLEDGE** in Pictures Two, Three, Five and Eight. Person-2 identified **RUTLEDGE** based upon her hair style and face even though it was partially covered. Person-2 had seen **RUTLEDGE** without a mask in person and on social media and was confident that the person captured by CCTV with the dark hair, red mask and black North Face jacket pictured above, is **RUTLEDGE**.

20. The CCTV footage shows **RUTLEDGE** and Female-1 had what appeared to be backpacks concealed under their outer garments.

Pictures 10 and 11 from CCTV showing Female-1 and RUTLEDGE carrying concealed backpacks.

21. During this investigation, Grand Jury subpoenas to cellular phone providers identified **BOSTIC** as having telephonic communications prior to January 6, 2021 and on the day of January 6, 2021, with an individual who coordinated convoys, communication plans, maps and packing lists for individuals planning to participate in the events on January 6, 2021. On the packing list provided by the protest organizer, the following items were recommended: asp baton, body armor, helmets and portable chargers. The recommended items would be difficult to carry without a container similar to that of a backpack. In a video posted on social media, the protest organizer indicated that participants were not looking for a fight but needed to be ready for one.

22. **RUTLEDGE**'s Facebook account was deleted before a preservation letter could be sent and there are not enough identifiers known to the investigative team to request additional account information. Grand Jury subpoenas were served for subscriber information for phone numbers associated with **RUTLEDGE.** The phone numbers were derived from public records and police reports in which **RUTLEDGE** was reported to be the user of phone numbers identified as having the last four digits 2006, 2007, 8818 and 3237. The aforementioned phone numbers were not registered to **RUTLEDGE** on January 6, 2021. The affiant is not aware of any phone numbers registered to **RUTLEDGE.**

23. **BOSTIC** and **RUTLEDGE** were both captured on CCTV utilizing their cellular phones to take videos and pictures while inside the U.S. Capitol. Based on the information found on **RUTLEDGE'S** Facebook page, CCTV footage, and the T-Mobile cellular phone location data from **BOSTIC'S** phone, there is probable cause to believe **RUTLEDGE** and **BOSTIC** were inside the U.S. Capitol on January 6, 2021.

24. Based on the foregoing, your affiant submits that there is probable cause to believe that **RUTLEDGE** and **BOSTIC** violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

25. Your affiant submits there is also probable cause to believe that **RUTLEDGE** and **BOSTIC** violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress and (G) parade, demonstrate, or picket in any of the Capitol Buildings.

[redacted]

Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 5th day of October 2021.

Zia M. Faruqui
2021.10.05 17:25:54
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HONORABLE ZIA M. FARUQUI
U.S. MAGISTRATE JUDGE